## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA CHARLESTON DIVISION

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEMS PRODUCTS LIABILITY

Master File No. 2:12-MD-02327 MDL 2327

LITIGATION

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ETHICON WAVE 12 CASES LISTED IN EXHIBIT A

JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

## NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF CHRISTINA PRAMUDJI, M.D. FOR WAVE 12

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motion, memorandum and reply brief filed in relation to Christina Pramudji for Ethicon Wave 1, Dkt. 2035 (motion), Dkt. 2037 (memorandum in support), Dkt. 2236 (reply). Plaintiffs respectfully request that the Court exclude Christina Pramudji's testimony, for the reasons expressed in the Wave 1 briefing. This notice applies to the following Wave 12 cases identified in Exhibit A attached hereto.

Dated: October 29, 2019 Respectfully submitted,

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## **EXHIBIT A**

| Alford, Doris             | 2:13-cv-14009 |
|---------------------------|---------------|
| Banda, Betty              | 2:15-cv-15404 |
| Barrera, Evelyn, deceased | 2:13-cv-12057 |
| Carter, Tamara            | 2:12-cv-01661 |
| Clowe, Paula Carole       | 2:12-cv-06893 |
| Cooper, Janis M.          | 2:12-cv-06593 |
| Dice, Denese              | 2:13-cv-03184 |
| Duhon, Wanda              | 2:13-cv-13621 |
| Ellerbee, Ovis            | 2:15-cv-08276 |
| Franklin, Lisa            | 2:15-cv-11810 |
| Getter, Dianne, Deceased  | 2:13-cv-07222 |
| Gilstrap, Patricia        | 2:16-cv-00236 |
| Green, Janice             | 2:12-cv-02148 |
| Kinard, Deborah           | 2:13-cv-09247 |
| Kirby, Sherry             | 2:16-cv-00238 |
| Mallow, Dawna             | 2:16-cv-08013 |
| McClurg, Janice           | 2:13-cv-22040 |
| Mobley, Tasha             | 2:15-cv-14159 |
| Pelham, Sandra J.         | 2:13-cv-08384 |
| Reynolds, Barbara         | 2:15-cv-14756 |
| Yarbrough, Suzanne        | 2:13-cv-11274 |

## **CERTIFICATE OF SERVICE**

I hereby certify that on October 29, 2019, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ D. Renee Baggett\_\_\_\_\_

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